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*Attorneys for Plaintiff*  
*Kelly Toys Holdings, LLC*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KELLY TOYS HOLDINGS, LLC,

*Plaintiff*

v.

ALIALIALILL STORE, BABY -SHOPPING STORE, BAZINGA STORE, BBOTTRUOYS TOY STORE, BOBONIU STORE, CHENWANJU STORE, CHILDREN GROWING TREE STORE, CHINESE PLUSH TOY STORE, DONGGUAN SHENGGEN HARDWARE PLASTIC CO., LTD., DONGGUAN WOODFIELD BABY PRODUCTS COMPANY LIMITED, DONGGUAN XINGKE GIFT CO., LTD., DROPSHIPPING-TOYS STORE, FAIRYLANDS TOY STORE, FCOT STORE, FOURTRY STORE, FRANCIS 001 STORE, FUN GAME FUN STORE, GUANGDONG SANSAN SUPPLY CHAIN CO., LTD., GUANGZHOU LITTLE TALENT TOYS CO., LTD., GUANGZHOU YIMAI TRADING CO., LTD., HANGZHOU AGREAT IMPORT & EXPORT CO., LTD., HEBEI KUNI ANIMATION INDUSTRY CO., LTD., HENAN YINGHUOZHIGUANG CULTURE MEDIA CO., LTD., MIKECRACK STORE, MONSTER JELLIE CULTURE CO., LTD., MOVING

**CIVIL ACTION No.**  
**21-cv-8434 (AJN)**

DREAMING STORE, NANJING  
RUIFUTONG ARTS AND TOYS  
MANUFACTURING CO., LTD., QWJA  
STORE, SHANGHAI QIANJIU TRADING  
CO., LTD., SHENZEN TONGFEI  
INTERNATIONAL TRADE CO., LTD.,  
SHENZHEN HECHUN TECHNOLOGY  
CO., LTD., SHENZHEN QINGHONG TOYS  
CO., LTD., SHOP5477120 STORE,  
SHOP910893006 STORE, SI TING STORE,  
SZ GTEAK TECHNOLOGY CO., LIMITED,  
TC XRC STORE STORE, TIKTOK IP  
STORE, VL STORE, XINXIANG PURUIGE  
IMPORT AND EXPORT TRADING CO.,  
LTD., YAMONG STORE, YANGZHOU  
AIXINI INTERNATIONAL TRADE  
IMPORT AND EXPORT CO., LTD.,  
YANGZHOU AORUNJU GIFTS CO., LTD.,  
YANGZHOU BABYJOY ARTS & CRAFTS  
CO., LTD., YANGZHOU CUTESHOOT  
PLUSHIES CO., LTD., YANGZHOU  
DULALA CRAFTS LTD., YANGZHOU  
KINGSTONE TOYS CO., LTD.,  
YANGZHOU MARISA TOY GIFTS CO.,  
LTD., YANGZHOU SCS HOMETEXTILE  
CO., LTD., YANGZHOU WEIHU  
HANDICRAFT CO., LTD., YANGZHOU  
WOSEN TOYS CO., LTD., YIWU  
CHUANYU IMPORT AND EXPORT FIRM,  
YIWU DUOTONG E-COMMERCE CO.,  
LTD., YIWU FUGUAN HOUSEHOLD  
SUPPLIES CO., LTD., YIWU HAIPING  
BAG FACTORY, YIWU QUANFA IMPORT  
& EXPORT COMPANY LIMITED, YIWU  
VICTORY IMPORT & EXPORT CO., LTD.,  
YIWU XINTU IMPORT AND EXPORT CO.,  
LTD., YIWU YINWEI HOUSEHOLD  
PRODUCTS CO., LTD., YIWU ZHENGZHI  
QIN TRADING FIRM and ZHANJIANG  
DYNAMIC POINT NETWORK  
TECHNOLOGY CO., LTD.,

*Defendants*

**NOTICE OF MOTION FOR DEFAULT JUDGMENT AND  
A PERMANENT INJUNCTION**

PLEASE TAKE NOTICE THAT, that in accordance with the Court's Individual Local Rule 55.2(b) and Federal Rules of Civil Procedure 55(b)(2), Plaintiff, by and through its undersigned counsel, moves for default judgment and a permanent injunction against the following Defendants: alialialiLL Store, baby -shopping Store, Bazinga Store, BBOTTRUOYS Toy Store, boboniu Store, chenwanju Store, Children Growing Tree Store, Chinese Plush Toy Store, Dongguan Shengen Hardware Plastic Co., Ltd., Dongguan Woodfield Baby Products Company Limited, Dongguan Xingke Gift Co., Ltd., Dropshipping-Toys Store, Fairylands Toy Store, FCOT Store, Fourtry Store, Francis 001 Store, Fun Game Fun Store, Guangdong Sansan Supply Chain Co., Ltd., Guangzhou Little Talent Toys Co., Ltd., Guangzhou Yimai Trading Co., Ltd., Hangzhou Agreat Import & Export Co., Ltd., Hebei Kuni Animation Industry Co., Ltd., Henan Yinghuozhiguang Culture Media Co., Ltd., Mikecrack Store, Monster Jellie Culture Co., Ltd., Nanjing Ruifutong Arts And Toys Manufacturing Co., Ltd., QWJA Store, Shanghai Qianjiu Trading Co., Ltd., Shenzhen Tongfei International Trade Co., Ltd., Shenzhen Hechun Technology Co., Ltd., Shenzhen Qinghong Toys Co., Ltd., Shop5477120 Store, Shop910893006 Store, SI TING Store, SZ Gteak Technology Co., Limited, TC XRC Store Store, TIKTOK IP Store, VL Store, Xinxiang Puruige Import And Export Trading Co., Ltd., YaMong Store, Yangzhou Aixini International Trade Import And Export Co., Ltd., Yangzhou Aorunju Gifts Co., Ltd., Yangzhou Babyjoy Arts & Crafts Co., Ltd., Yangzhou Cuteshoot Plushies Co., Ltd., Yangzhou Dulala Crafts Ltd., Yangzhou Kingstone Toys Co., Ltd., Yangzhou Marisa Toy Gifts Co., Ltd., Yangzhou SCS Hometextile Co., Ltd., Yangzhou Wosen Toys Co., Ltd., Yiwu Chuanyu Import And Export Firm, Yiwu Duotong E-Commerce Co., Ltd., Yiwu Fuguan Household Supplies Co., Ltd., Yiwu Haiping Bag Factory,

Yiwu Quanfa Import & Export Company Limited, Yiwu Victory Import & Export Co., Ltd. and  
Yiwu Xintu Import And Export Co., Ltd. (“Defaulting Defendants”).

Dated: March 11, 2022

Respectfully submitted,

EPSTEIN DRANGEL LLP

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